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Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

By Electronic Submission

John Muleta
Chief, Wireless Telecommunications Bureau
Federal Communications Commission
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David Solomon
Chief, Enforcement Bureau
Federal Communications Commission
445 12th Street, S.W.
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Re E911 Interim Report for Tier III Carriers
CC Docket No. 94-102
Kodiak Wireless, LLC

Dear Ms. Dortch

Pursuant to the Commission's *Order to Stay*, in the above referenced docket,¹ Kodiak Wireless, LLC ("Kodiak") hereby submits its E911 Interim Report for Tier III carriers. This Report provides the Commission with the current status of Kodiak's E911 efforts and its progress towards compliance with the Commission's E911 Phase II benchmarks.

Please contact the undersigned if you should have any questions regarding this Report.

Sincerely,



Jeff Derrickson

Kodiak Wireless, LLC
(907) 486-7782

¹ Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Phase II Compliance Deadlines for Non-Nationwide CMRS Carriers, CC Docket No. 94-102, Order to Stay, FCC 02-210, 17 FCC Rcd 14,841 (2002).

INTERIM REPORT FOR TIER III CARRIERS

KODIAK WIRELESS, LLC

Kodiak Wireless, LLC ("Kodiak") hereby provides the Commission with its E911 Interim Report for Tier III Carriers ("Report"). As a Tier III carrier, Kodiak is submitting this one-time Report in order to provide the Commission with the current status of E911 in the Kodiak, Alaska area. Kodiak is the cellular licensee in the A2 portion of the Alaska 2 – Bethel RSA (call sign WPOL234).

Kodiak is a small rural cellular provider that operates off of one switch on Kodiak Island in Alaska. Kodiak Island's population density is less than two people per square mile. Kodiak's customer base is comprised of approximately 1600 subscribers from a local military base, fishing villages, and tourists who visit Kodiak Island.

There is one PSAP on the island of Kodiak which is capable of receiving E911 calls but not Phase I or Phase II service. As such, Kodiak has not received any requests for Phase I or Phase II service. Kodiak notes, however, that it recently upgraded its switch and its new switch is capable of supporting Phase I E911 service. The switch will not be converted, however, until such service is requested from the PSAP.

Currently, Kodiak's cellular system uses TDMA technology. As the Commission is aware, TDMA ALI-capable handsets are not widely available in general and scarcely available to a small carrier such as Kodiak. Indeed, the cost of the ALI-capable phones is over \$100 more than Kodiak's customers currently pay for their phones. In order to entice its customers to purchase such a phone, assuming it was even available, Kodiak would need to significantly subsidize the costs of the phones, an expense that will disproportionately impact a small carrier such as Kodiak.

As the PSAP in Kodiak is not capable of receiving either E911 Phase I or Phase II traffic, Kodiak does not perceive a demand by its customers for an ALI-capable handset. Thus the Phase II functions of the ALI-capable handsets cannot be used by Kodiak's customers in the foreseeable future.

Kodiak intends on using the handset based solution to provide Phase II service but with the lack of availability of ALI-capable handsets and the inability of Kodiak's only PSAP to receive Phase II service, Kodiak has not obtained any ALI-capable handsets. Thus, unless the availability of ALI-capable handsets suddenly increases, Kodiak will be compelled to file a petition for an extension of the September 1, 2003 benchmark for the commencement of selling ALI-capable handsets.

Given the difficulties Kodiak has experienced with its TDMA system, Kodiak is currently planning to overlay its network with a GSM system and use the GSM ALI-capable handsets for meeting the Commission's benchmarks. While such an endeavor is a significant and capital intensive undertaking, Kodiak anticipates completing this

project by third quarter 2004. As such, Kodiak will be in a position to meet the Commission December 31, 2005 benchmark of a 95% penetration rate for ALI-capable handsets.

Kodiak understands the importance of E911 and its obligations as a licensee to assist in ensuring that E911 Phase I and Phase II services are properly implemented. Kodiak, however, finds itself in an unusual posture as its only on-island PSAP is not capable of receiving either Phase I or Phase II E911 information and will not be capable of such in the near future. If the PSAP should upgrade its system, Kodiak stands ready to work cooperatively with the PSAP to implement E911 service.

DECLARATION OF Jeff L Derrickson

I, Jeff L Derrickson, am an officer of Kodiak Wireless, LLC and I hereby certify that to the best of my knowledge and belief the information contained on this form and the attached document is complete and accurate.

Signed: Jeff L Derrickson

Date 7-31-03